

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN**

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| UNITED STATES OF AMERICA, | § | |
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| | § | |
| Plaintiff, | § | |
| | § | |
| v. | § | Case No. 3:15-cv-00371 |
| | § | |
| SPECTRUM BRANDS, INC., | § | |
| a Delaware corporation, | § | |
| | § | |
| Defendant. | § | |

NARRATIVE BACKGROUND OF EXPERT ALAN SCHOEM

Spectrum Brands, Inc. hereby submits the following written narrative statement of the background and experience of Alan Schoem:

Alan Schoem is an expert regarding product safety issues and the processes and procedures of the U.S. Consumer Product Safety Commission, also known as the “CPSC.” Mr. Schoem worked at the CPSC for 31 years, where he was the Director of the Office of Compliance from 1997 until 2004. During that time, Mr. Schoem was responsible for the entire product safety enforcement program at the CPSC, including conducting investigations of potentially defective products, pursuing product recalls, conducting administrative litigation, advising companies on complying with CPSC rules and regulations, evaluating whether companies had an obligation to report to the CPSC, and pursuing civil penalties against companies that violated CPSC rules and regulations. As the Director of the Office of Compliance, Mr. Schoem was responsible for leading a team of CPSC officials that assessed the risk of injury associated with consumer products, assessed corrective actions to address the risk, and reviewed the adequacy of recall notices.

Prior to serving as the director of the CPSC Office of Compliance, Mr. Schoem served various roles at the agency, including Director of the Office of Administrative Litigation in the Office of Compliance, and working as an attorney in the Office of the General Counsel. In these roles, Mr. Schoem pursued civil penalties against companies that violated mandatory safety standards or Consumer Product Safety Act reporting requirements, including the filing of federal court litigation through the U.S. Department of Justice. Mr. Schoem regularly provided legal advice to the CPSC on its rulemaking activities and the interpretation of CPSC regulations and statutes.

Following his career at the CPSC, Mr. Schoem was an expert consultant in the Global Product Risk Practice within Marsh Risk Consulting, part of Marsh & McLennan Companies, from 2004 to 2011. In that role, he provided expert professional consulting services for clients who encountered a product risk issue including the need to report to CPSC and conduct a product recall. Mr. Schoem's clients included companies requesting guidance in dealing with consumer product, food, medical device and automotive equipment issues. He worked with companies on regulatory compliance, minimizing the potential for product recalls, preparing for recalls, conducting product recalls, and recovering from product recalls.

Since leaving Marsh, Mr. Schoem has continued to advise companies on product safety issues through his own law practice. As part of Mr. Schoem's practice in the area of regulatory compliance, he advises firms on interpretations of CPSC statutes and regulations, including the reporting requirements of the Consumer Product Safety Act. Mr. Schoem received his undergraduate B.A. degree from the University of Maryland College Park in 1968. Thereafter, he received his law degree from American University, Washington College of Law in 1972. Mr. Schoem is admitted to the Bars of Maryland and the District of Columbia.

Dated: September 30, 2016

Respectfully submitted,

/s/ Eric. J. Wilson

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